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MEDICAL DATA SYSTEMS, INC.

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

LEON HARRIS,

Plaintiff,

vs.

MEDICAL DATA SYSTEMS, INC. D/B/A
MEDICAL REVENUE SERVICE,
Defendant.

Case No.: 2:19-cv-00219-APG-VCF

**STIPULATION TO WITHDRAW
DEEMED ADMISSIONS AND EXTEND
TIME TO RESPOND TO DISCOVERY**

Plaintiff Leon Harris (“Harris”) and Defendant Medical Data Systems, Inc. (“MDS”) (together, the “Parties”) by and through their respective counsel of record, hereby submit this Stipulation and Order to Withdraw Deemed Admission and Extend Time To Respond To Written Discovery.

The Stipulation is submitted because MDS needs additional time to respond to Plaintiff’s written Interrogatories, Requests for Admissions and Request for Production of Documents (“Plaintiff’s Written Discovery Requests”). Plaintiff’s Written Discovery Requests were properly served on Defendant on April 16, 2019. Thereafter, an attorney left MDS’s counsel’s firm which resulted in Plaintiff’s Discovery Requests being inadvertently unanswered and Plaintiff’s Requests for Admissions being deemed admitted. The parties agree that the deemed admission should be withdrawn and that MDS shall have until July 18, 2019 to respond to Plaintiff’s Written Discovery Requests.

IT IS THEREFORE HEREBY STIPULATED AND AGREED that the Court shall issue an Order withdrawing the deemed admissions; and

1 IT IS ALSO STIPULATED AND AGREED that MDS shall have until July 18, 2019 to
2 provide responses to Plaintiff's Written Discovery Requests.

3
4 Dated this 28th day of June, 2019.

5 HAINES & KRIEGER, LLC

6 /s/ Shawn W. Miller

7 DAVID KRIEGER, ESQ.

8 Nevada Bar No. 9086

9 SHAWN W. MILLER, ESQ.

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13 *Attorneys for Plaintiff*

Dated this 28th day of June, 2019.

WILSON ELSEER MOSKOWITZ EDELMAN
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/s/ Jorge A. Ramirez

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Attorneys for Medical Data Systems, LLC

11 **IT IS SO ORDERED:**

12 July 1, 2019



14 **UNITED STATES MAGISTRATE JUDGE**

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16 Submitted by:

17 WILSON ELSEER MOSKOWITZ EDELMAN
18 & DICKER LLP

19
20 By: /s/ Jorge A. Ramirez

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